REMARKS

Claims 1-5, 9-19, 23-33, 37-47, and 51-56 are rejected. Claims 1-5, 10, 15-19, 24, 29-33, 38, 43-47, and 52 are amended. No new matter has been added. Claims 1-5, 9-19, 23-33, 37-47, and 51-56 remain for reconsideration.

Claim Rejections – 35 USC § 103

Claims 1-5, 9-11, 13-19, 23-6, 27-33, 37-39, 41-47, 51-53, and 55-56 are rejected under 35 U.S.C. 103(a) as being unpatentable over Agrawal et al. (Agrawal), U.S. Pat. No. 6,788,660 B1 in view of Osterhout et al. (Osterhout), U.S. Pat. No. 6,965,614 B1.

Applicant respectfully traverses the rejections.

In the claimed invention, Session Initiation Protocol (SIP) devices can communicate with devices in an H.323 network and vice versa. For example, when a SIP device wants to establish communications with a device in an H.323 network, the SIP device sends an invite message. A network switch 310 allows the SIP device to communicate with the called device in the H.323 network by converting the SIP invite message to an H.323 request message. The network switch also converts an H.323 response message to a SIP reply message. Similarly, an H.323 terminal can establish communications in a SIP network by sending an H.323 request message. A network switch 410 allows the H.323 terminal to communicate with the called device by converting the H.323 request message to a SIP location request message and also converting a SIP response message to an H.323 reply message.

Independent claims 1, 15, 29, and 43 have been amended to specify that the signaling protocols in the invention are packet signaling protocols. For example, claim 1 has been amended to clarify that the device comprises *a network interface for coupling a network device using a second packet signaling protocol to a network using a first packet signaling protocol.* None of the cited prior art, alone or in combination, teaches devices or methods for allowing interoperability a device using one packet signaling protocol with a network using another packet signaling protocol.

Contrary to the Examiner's assertion, Osterhout does not teach or suggest conversion between packet signaling protocols. Instead, Osterhout discloses conversion between a packet signaling protocol (SIP) and the Universal Serial Bus (USB) protocol. See Osterhout, Abstract. As the Examiner noted in the Office Action, Osterhout's system converts between data according to the first protocol and data according to a second protocol defining a

peripheral link. See Osterhout, col. 2, lines 40-67. The USB protocol is not a packet signaling protocol. Rather, the USB protocol is a hardware bus standard that allows a user to plug a peripheral device to a USB port and have it automatically configured and ready to use.

Moreover, the suggested combination or modification would change the principle of operation of the primary reference (Agrawal). MPEP § 2143.01 states:

> If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious.

As the Examiner acknowledged in the Office Action, Agrawal does not perform any conversions between packet signaling protocols, as taught in the claimed invention. To setup a call between two gatekeepers located in two H.323 zones, Agrawal discusses using two different protocols: H.225.0 and H.245. The H.225.0 protocol is used to establish the connection (See FIG. 2, steps 200-1 to steps 200-9) and H.245 is used to establish the call, negotiate capabilities, and open logical channels (See FIG. 2, steps 200-10 to steps 200-17) between two terminals. Both the H.225.0 and the H.245 protocols are used within H.323 communication sessions, with each protocol having a specific function. Converting from H.225.0 to H.245 and vice versa would change the framework of H.323, i.e. the principle of operation of H.323.

Thus, none of the prior art, alone or in combination, discloses amended independent claims 1, 15, 29, and 43. Therefore, withdrawal of the rejection is respectfully requested.

Claims 2-5 and 9, 16-19 and 23, 30-33 and 37, 44-47 and 51, dependent on amended independent claims 1, 15, 29, and 43, respectively, are also allowable because they depend from an allowable claim and recite further distinguishing limitations. Therefore, withdrawal of the rejections is respectfully requested.

Independent claims 10, 24, 38, and 52 have been amended to clarify that the claimed device comprises a network interface for coupling *an H.323 network device* to a *Session Initiation Protocol (SIP)* network; and a processor adapted to receive and analyze a H.323 request message *from the H.323 network device to initiate communications with the SIP network.* As discussed above, neither Agrawal nor Osterhout suggests a processor that receives and analyzes a message in one packet signaling protocol and converts the received and analyzed message to a message in another packet signaling protocol, i.e., from H.323

protocol to SIP and vice versa. None of the prior art, alone or in combination, discloses claims 10, 24, 38, and 52. Therefore, withdrawal of the rejections is respectfully requested.

Claims 11-14, 25-28, 39-42, and 53-56, dependent on amended independent claims 10, 24, 38, and 52, respectively, are also allowable because they depend from an allowable claim and recite further distinguishing limitations. Therefore, withdrawal of the rejections is respectfully requested.

Conclusion

For the foregoing reasons, reconsideration and allowance of claims 1-5, 9-19, 23-33, 37-47, and 51-56 of the application as amended is requested. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

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Respectfully submitted,

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